

Exhibit H

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

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5 COPY

6 SANDRA FAVELA, et al.,)

7 Plaintiffs,)

8 vs.)

Case No. C-04-0895-WHA

9 TARGET CORPORATION, et al.,)

10 Defendants.)
11
12

13 DEPOSITION OF

14 NANCY L. WILLIAMS

15 THURSDAY, JANUARY 6, 2005
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18
19

20 WHITE & ASSOCIATES
21 Certified Shorthand Reporters
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24 REPORTER: ANGELA J. WHITE, CSR NO. 11287
25

1 Rohnert Park store who are plaintiffs in this case who
2 actually did get rehired by Target using different social
3 security numbers?

4 A Hum. Am I aware of some. I recently became
5 aware that there were some that were rehired. And I think
6 that since that particular period of time we've had some
7 throughout my territory. As we -- if we have discovered
8 them and asked the team members and were made aware of
9 them, we've addressed them individually.

10 So I recently became aware that there may have
11 been two that did come back and reapply under different
12 numbers, which our system would not have caught.

13 Q Right, but the managers presumably would know
14 that's the same person. I'm just wondering --

15 A In some cases. In some cases, people went to
16 different stores where people didn't know.

17 Q Well, specifically, are you aware of the case of
18 Sergio Delgadito and whether he was rehired?

19 A I became aware after he was rehired.

20 Q Do you know if he's still working there?

21 A Um, I think he is. I think he is.

22 Q Okay. And was he rehired at the same store?

23 A I think he was.

24 Q And did he use a different social security
25 number?

1 conversation she had with him?

2 A It'd be secondhand. And he thought that that was
3 okay to do, obviously.

4 Q Okay. Did Kim tell him, as far as you understand
5 it -- I know you were not present, were not one of the
6 participants in that conversation -- but to your
7 understanding, to your knowledge, did Kim tell him, "Well
8 no, you're not supposed to do that"?

9 A Yes, he did. She did.

10 Q Right. And but he still works there, as far as
11 you know?

12 A As far as I know.

13 Q Did you instruct him to terminate him?

14 A I didn't do any instruction.

15 Q Do you know if Kim did?

16 A She did not.

17 Q Do you know if Michael did?

18 A Terminated? No.

19 Q Yeah, because -- all right.

20 A That's my understanding, he did not.

21 Q Okay. Do you know how it was that Kim and/or
22 Landra would have notified the stores of your instructions
23 as to how to deal with that particular situation, i.e.,
24 where someone came back saying they were now good, whereas
25 before they were bad? I mean, do you know if she just had

1 in-person conversations, phone calls, e-mails, faxes?

2 A Those are typ -- typically they are, um, phone
3 calls. I don't know if there were any that were e-mail
4 conversations. There could be. But typically they were
5 phone calls where the store would call for advice.

6 Q Do you know if Michael had indicated that he had
7 hired others back, other than Sergio Delgado, others of
8 the December, January people?

9 A I'm sorry, do I know if he --

10 Q In other words, you are aware that Kim and
11 Michael discussed the situation of Sergio Delgado.

12 A Right.

13 Q Do you know if any other employees were discussed
14 between Kim and Michael?

15 A There was one other.

16 Q Do you know if that was Estella Robles,
17 Maria Ramirez --

18 A Maria Ramirez.

19 Q Was it same type of thing, she was hired back by
20 Michael?

21 A Right.

22 Q Same store?

23 A Yes.

24 Q Different social?

25 A To my understanding.